

SAMPLE
VOIR DIRE QUESTIONS BY COURT
Civil Jury Trial

The Court will first conduct a comprehensive examination of the jury panel. After the Court has finished its examination of the jury panel, counsel may elect to supplement the Court's examination with questions that do not repeat in substance any question already put to the panel by the Court.

The Court's examination will include questions such as the following:

A. Knowledge of the Parties, Counsel, and Witnesses

1. The Plaintiff(s) is/are seated at counsel table. _____, will you please stand? Are any of you or is any member of your immediate family personally acquainted with the Plaintiff(s), related to him/her/them by blood or marriage, or do any of you or does any member of your immediate family have any connection of any kind with the Plaintiff(s)?
2. The Plaintiff(s) is/are represented by _____, who is/are seated at counsel table. _____, will you please stand? _____ is/are with the law firm of _____. Are any of you or is any member of your immediate family personally acquainted with the _____, or any of the other attorneys from his/her/their law firm, _____? Are any of you related to them by blood or marriage, or do any of you or does any member of your immediate family have any connection of any kind with them?
3. The Defendant(s) is/are seated at counsel table. _____, will you please stand? Are any of you or is any member of your immediate family personally acquainted with the Defendant(s), related to him/her/them by blood or marriage, or do any of you or does any member of your immediate family have any connection of any kind with the Defendant(s)?
4. The Defendant(s) is/are represented by _____, who is/are seated at counsel table. _____, will you please stand? _____ is/are with the law firm of _____. Are any of you or is any member of your immediate family personally acquainted with the _____, or any of the other attorneys from his/her/their law firm, _____? Are any of you related to them by blood or marriage, or do any of you or does any member of your immediate family have any connection of any kind with them?

5. I am going to read a list of witnesses who may be called during this trial.
Please respond if you know any of these persons:

The Plaintiff(s) may call the following persons as witnesses:

[list witnesses from Final Pretrial Order, including expert witnesses]

The Defendant(s) may call the following persons as witnesses:

[list witnesses from Final Pretrial Order, including expert witnesses]

Is any panel member related by family or marriage to any of the individuals that I have just named?

Are you personally acquainted with these persons, or do you have any knowledge of them, directly or indirectly, through your social, business or professional lives?

B. Knowledge of the Case

6. Have any of you read or heard anything about this case from any source, and I am not indicating from this question that there has been any publicity concerning it?

C. Previous Jury Duty

7. Have any of you served as jurors in either criminal or civil cases, or as members of a grand jury, either in the state or federal courts?
- a. Civil
 - b. Criminal
 - c. Grand Jury

Would your prior experience have any effect or influence on your ability to serve as a fair and impartial juror in this case?

D. Business Dealing with the Parties

8. Have you or any member of your immediate family had business dealings with the Plaintiff(s) or the Defendant(s)?

E. Previous Litigation of Prospective Jurors

9. Have any of you or has any member of your immediate family ever participated in a lawsuit of any kind, as a party or in any other capacity?

F. Ability to Sit as Fair and Impartial Jurors

10. Does any panel member have any feeling--thought--inclination--premonition--prejudice--religious belief or persuasion--or bias--which might influence or interfere with your full and impartial consideration and which might influence you either in favor of or against either the Plaintiff(s) or the Defendant(s)?
11. You must understand that it is most important for you to keep open minds until you have heard all the evidence and received the Court's instruction concerning the law. Is there anyone here who would not be able to keep an open mind until all of the evidence is produced and the Court's instructions are received?
12. Will you take the law as the Court instructs you, without any reservation whatsoever, and apply the facts to the Court's instructions on the law? If you cannot do this, please hold up your hand.
13. Do you recognize and accept the proposition that jurors are the sole judge of the facts and the Court is the sole judge of the law? If you do not recognize this or cannot accept this, please hold up your hand.
14. Is there anyone here who would not be able or willing to render a verdict solely on the evidence presented at the trial and the law as I give it to you in my instructions, disregarding any other ideas, notions, or beliefs about the law that you may have?

E. Personal Inconvenience

15. Does any person here have any medical disability or problem -- such as difficulty in seeing or hearing -- or any illness that might cause a problem in serving as a juror in this case?
16. This trial may last _____. The exact period of time is impossible, of course, to know today. Does any prospective juror have any immediate personal or family situation that would limit his or her ability to serve as a juror in this case for the period of time?
17. Finally, can any of you think of any matter that you should call to the Court's attention that may have some bearing on your qualifications as a juror, or that -- even to the slightest degree -- may prevent your rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?